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Attorneys for Defendants
CITY OF GONZALES, OFFICER LOMBARDI, OFFICER C. AYALA,
SERGEANT K. WISE, and OFFICER SIBAYAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

		Case No. C-06-03745 JF (HRL)
HENRY MEZA, an individual, and)	
JUVENTINA RAMIREZ, an individual,)	STIPULATION AND [PROPOSED]
)	ORDER CONTINUING EXPERT
Plaintiff(s),)	WITNESS DISCOVERY CUT-OFF
)	DATES
vs.)	
)	Pretrial Conference: March 8, 2008
)	Trial: March 14, 2008
CITY OF GONZALES, a municipal)	Courtroom 3, 5th Floor
corporation, OFFICER LOMBARDI, an)	The Honorable Jeremy Fogel
individual, OFFICER C. AYALA, an)	
individual; OFFICER SERGEANT K.)	
WISE, an individual; OFFICER SIBAYAN,)	
an individual; and DOES 1 through 50,)	
inclusive)	
)	
Defendant(s).)	

IT IS HEREBY STIPULATED by and between the parties to this action, through their
respective counsel of record, that:

(1) The expert designation and disclosure cut-off date, currently set for
December 14, 2007, be continued to January 31, 2008;

(2) The rebuttal expert date, currently set for December 28, 2007, be continued to
February 14, 2008;

1 (3) The expert discovery cut-off date, currently set for February 14, 2008, is
2 continued to February 22, 2008.

3 Good cause exists for a continuance of the expert designation date and disclosure of
4 reports in this case based on the following:

5 Federal Rule of Civil Procedure 26(a)(2)(B) and Rule 26 (a)(4)(A) provide that the
6 parties may stipulate to reschedule the expert discovery cut off, and expert depositions must be
7 taken after disclosure of expert reports. Health care providers that have rendered opinions
8 relative to this matter will need to be deposed before the various experts in this case can prepare
9 their reports. Those depositions are not currently scheduled because the parties need to first
10 receive a full and complete copy of the entire medical records from Natividad Hospital which
11 did not provide a complete record. In addition, Defendants' Motion for Summary Judgment
12 will be heard February 8, 2008, and it will be beneficial to the parties to have a determination of
13 that hearing before the expense of expert depositions.

14 There have been no modifications to the Court's Scheduling Order in this case. Other
15 than continuing the dates that are subject to the stipulation, the requested continuance will have
16 no impact on the schedule for the case.

17 Dated: January 16, 2008

18 LAW OFFICES OF VINCENT P. HURLEY
19 A Professional Corporation

20 By: /s/ Vincent P. Hurley
21 VINCENT P. HURLEY
22 Attorneys for Defendants CITY OF GONZALES,
23 OFFICER LOMBARDI, OFFICER C. AYALA,
OFFICER SERGEANT K. WISE, and OFFICER
SIBAYAN

24 Dated: January 16, 2008

25 SCHAUMAN & HUBINS

26 By: /s/ William F. Schauman
27 WILLIAM F. SCHAUMAN
28 Attorneys for Plaintiffs HENRY MEZA and
JUVENTINA RAMIREZ

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IT IS SO ORDERED.

Dated: 1/18/08 _____



The Honorable Jeremy Fogel
Judge of the District Court for the
Northern District of California